REMARKS

Claims 13 and 16 are rejected under 35 U.S.C. 102(e) as being anticipated by Sowlati et al. (USP 6,570,210B1). Claims 14 and 15 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1-12 are allowed over the prior art of record.

1. Objection to the specification:

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The specification was objected to because the title of the invention is not descriptive. To overcome this objection, the title of the invention has been amended. Consideration of the amendment to the title is politely requested.

2. Rejection of claims 13 and 16 under 35 U.S.C. 102(e):

Claims 13 and 16 were rejected under 35 U.S.C. 102(e), for reasons of record that can be found on pages 2-3 in the Office action identified above, which is part of paper No.0803.

To overcome this rejection, claim 13 has been amended. No new matter is entered. Reconsideration of the amended claim 13 is politely requested.

The prior art of record fails to disclose "a plurality of first capacitor members and second capacitor members insulated from the first capacitor members over the conductive plate, wherein the first capacitor members define a grid area encompassing the second capacitor member to form an integrated capacitor", as required by the amended claim 13. Accordingly, the Applicants suggest that the amended claim 13 is now in condition for allowance, and such action is therefore politely requested.

As claim 16 is dependent upon the amended independent claim 13, it should be allowable if the amended claim 13 is allowed. Reconsideration of claim 16 is therefore politely requested.

30 3. Objection to claims 14-15:

As claims 14-15 are dependent upon the amended independent claim 13, they should be allowable if the amended claim 13 is allowed. Reconsideration of claims 14-15 is therefore politely requested.

35 4. Newly added claims 17 and 18:

The limitation "each of the plurality of first capacitor members is isolated from the conductive plate by at least one layer of dielectric material" that is found allowable by the Examiner has been added in the new dependent claim 17. The limitation "the conductive plate is floating and is made of metal" that is found allowable by the Examiner has been added in the new dependent claim 18. Consideration of the newly added claims 17 and 18 is politely requested.

Sincerely yours,

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